

# Exhibit C

# ADAPTIVETECHNOLOGYSERVICES

## PDF Accessibility Assessment

### Alameda County Fictitious Business Name Statement

Date: December 21, 2022

Filename: GBNS275-321FictitiousBusinessNameStatement-REV111422

Document Source:

Internet Archive capture of Alameda County website – [www.acgov.org](http://www.acgov.org)

Document URL:

<http://co.alameda.ca.us/forms/auditor/GBNS275-321FictitiousBusinessNameStatement-REV111422.pdf>

*and also at*

<https://web.archive.org/web/20221209002203/http://acgov.org/forms/auditor/GBNS275-321FictitiousBusinessNameStatement-REV111422.pdf>

JAWS Versions: JAWS 2023 – 2023.2212.23 JAWS 2022 – 2022.2211

Acrobat Version: Acrobat Pro 2021.007.20099

Browsers: Microsoft Edge Google Chrome

### Executive Summary

It is my opinion to a reasonable degree of professional certainty as an expert in JAWS and screen reader accessibility, based on over 23 years of working with JAWS, other screen readers and PDF content, and my testing in several environments, that:

- this FBNS form is not accessible under any professional standard;
- this FBNS form cannot be independently completed by a blind person who needs non-visual access through screen reader technology such as JAWS; and
- The above is true no matter which screen reader or PDF viewer might be used.

### Document Review

The document is a 2-page form used to provide information about the owners of a business with a fictitious name.

Page 1 of the document is a form that that collects address information about the business, names and addresses of the registered owners, the type of owner. The form

uses standard edit boxes and checkboxes.

Page 2 of the document is a text-only page of instructions for how to complete the form.

The form cannot be independently completed or signed by a blind applicant.

Label names for each of the form elements are not announced as the user tabs through the document.

When entering text in the form fields, JAWS does not echo the key names. Users cannot use the arrow keys to review entered text. The backspace key removes text but does not announce the letters being deleted.

### **Test Results**

I reviewed the document from the Alameda County website. There are two ways to access PDF documents from the web; open the document and read it within the browser or download the document to the computer and open it with Acrobat Reader or Acrobat Pro. I tested both methods. Best practice for accessing PDF forms is to use Acrobat Reader or Acrobat Pro.

For the browser method I tested the document with both Microsoft Edge and Google Chrome, the two most popular browsers. The results were identical for both browsers. I was not able to successfully complete the form relying only on JAWS feedback.

For the second method, I downloaded the document and opened it in Acrobat Pro. With Acrobat Pro I was able to examine the document properties and verify that no security settings were enabled that might prevent JAWS from reading the document correctly. I was unable to successfully complete the form relying only on JAWS feedback.

In both cases, JAWS would not announce the label names of form elements or announce input into the edit boxes properly.

### **Testing Notes**

When the document is first opened JAWS announces the message “document has no links” and begins reading text at the top of the second page. The document indeed has no links. JAWS should begin reading on page 1.

Document properties are set to start reading at page one, but JAWS immediately jumps to page two and starts reading. JAWS should begin reading on page 1.

Users can navigate page 2 using standard JAWS navigation commands and JAWS does read the page in the correct order.

Page 2 has a document number and revision at the top of the page (275-321 [Rev. 10/18]) that JAWS does not read. When commands are given to jump to the top of the page, JAWS moves to and begins reading from the center heading ("Instructions for Completion..."). I was unable to read the document number and revision.

I could move to the first page with the standard Previous Page command (Control+PageUp). If I alt-tabbed away from the file, then alt-tabbed back, the document would jump back to the second page and JAWS would announce the title bar text (including document name). If I used any cursor navigation commands (up/down/left/right arrow, home, end, etc). The document would jump back to the second page.

The first page contains the form elements and descriptive text to provide information about each specific control. I reviewed the form elements and determined that the Form Element Properties ToolTip field was contained text values (this field is required by JAWS). The text in this field is announced by JAWS as the field label when tabbing through the form.

I could not review any non-form element text on the page 1 with Acrobat Pro. Anytime I tried to use a JAWS command to read any of the descriptive text on the page, the virtual focus jumped back to the second page.

I was able to review some non-form element text on page 1 when using a browser to access the document. However, this text was not announced in logical order, instead, JAWS would jump around to different parts of the document and blocks of text out of order.

To complete an Acrobat PDF form, a blind user presses the Tab key to move from field to field. I could press tab and the focus would move to the next field. However, JAWS would not announce the field label (the text entered in the Tooltip field of the form elements).

If I tried to use JAWS commands to read the text above or to the left of the field (where the labels are shown visually on the page), JAWS would jump back to the second page.

I could tab through the entire set of form elements, but JAWS would not announce any labels.

In the web browsers and Acrobat Pro, when I typed text in a field, it would let me enter

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text, but it would perform the Virtual PC cursor action for the keystroke. If I turned the Virtual PC cursor off, JAWS would announce the characters, but I was unable to use the arrow keys or backspace key to review or correct an entry. Arrow keys would move but not announce the current character. Backspace would not work at all.

Notes about the Virtual PC Cursor: The Virtual PC cursor is a JAWS feature that makes it easier to navigate web pages and some Word and PDF forms. When the Virtual PC cursor is on, a user can type Navigation Quick Keys (single letters) to jump to specific elements on a web page or in a document. JAWS automatically detects when it is in a form field and turns off the Virtual PC cursor so the user can type characters in the form field.

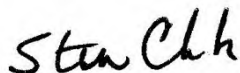
For example, if I typed the letter E when the Virtual PC cursor is on, JAWS will try to jump to the next edit box and say the label. If I type the letter E while the Virtual PC cursor is off, JAWS will input the character into the form element.

JAWS did not detect that it was in a form element in either the browsers or Acrobat Pro and did not turn off the Virtual PC cursor automatically. When typing text, sometimes JAWS would enter the letter into the form element, sometimes not. I could not hear the name of any key as I filled out the form from the keyboard while JAWS was running. Instead, JAWS would announce the text as if a Navigation Quick Key action had occurred. Once I had text in an edit box, I was not able to use cursor keys to review the text letter by letter. JAWS would not announce the letters when I arrowed back. I was not able to use the backspace key to erase text while JAWS was running but could use the key when JAWS was not running.

I was able to check and uncheck check boxes, but JAWS would not announce the name of the check box as I tabbed through the list and only announced "space" when I pressed the space bar and did not announce the status of the check box.

Users are unable to sign the form without sighted assistance.

Sincerely,

A handwritten signature in black ink that reads "Steven Clark". The signature is written in a cursive, slightly slanted style.

Steven Clark  
Adaptive Technology Services